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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-3664-YGR-SVK

[PROPOSED] ORDER GRANTING
MOTION TO SEAL

Judge: Hon. Yvonne Gonzalez Rogers

[PROPOSED] ORDER

Before the Court is Google LLC's Administrative Motion to Seal portions of Google's Motion for Summary Judgment ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document or Portion of Document Sought to be Sealed	Evidence Offered in Support of Sealing	Ruling
Google LLC's Motion for Summary Judgment Pages 2:27-28, 6:17, 6:19, 7:4	Olson Declaration ¶¶ 3-5	
Statement of Undisputed Facts Pages 5:11, 5:21, 6:10, 7:3, 10:7	Olson Declaration ¶¶ 3-5	
Broome Declaration Ex. 11 Plaintiff William Byatt's Objections and Responses to Defendant's Third Set of Requests for Admission (Nos. 22-29) <u>Plaintiffs' Material</u> PDF Page 7:9-10, 7:12-13	Olson Declaration ¶ 6; Plaintiffs to provide declaration	
Broome Declaration Ex. 16 Plaintiff Chasom Brown's Objections and Responses to Defendant's First Set of Interrogatories (Nos. 1-6) <u>Plaintiffs' Material</u> PDF Pages 4:13, 4:17-19, 4:21, 7:5-7, 7:10	Olson Declaration ¶ 6; Plaintiffs to provide declaration	
Broome Declaration Ex. 17 Plaintiff William Byatt's Objections and Responses to Defendant's First Set of Interrogatories (Nos. 1-6)	Olson Declaration ¶ 6; Plaintiffs to provide declaration	

1	<u>Plaintiffs' Material</u>		
2	PDF Pages 4:13-15, 4:17-18,		
3	4:20-21, 7:1-2, 7:5		
4	Broome Declaration Ex. 18	Olson Declaration ¶ 6;	
5	Plaintiff Christopher Castillo's	Plaintiffs to provide	
6	Objections and Responses to	declaration	
7	Defendant's First Set of		
8	Interrogatories (Nos. 1-6)		
9	<u>Plaintiffs' Material</u>		
10	PDF Pages 4:13-15, 4:17-20,		
11	4:22, 5:7, 7:2-8		
12	Broome Declaration Ex. 19	Olson Declaration ¶ 6;	
13	Plaintiff Jeremy Davis'	Plaintiffs to provide	
14	Objections and Responses to	declaration	
15	Defendant's First Set of		
16	Interrogatories (nos. 1-6)		
17	<u>Plaintiffs' Material</u>		
18	PDF Pages 4:13, 4:16, 7:6		
19	Broome Declaration Ex. 20	Olson Declaration ¶ 6;	
20	Plaintiff Chasom Brown's	Plaintiffs to provide	
21	Verified Amended Objections	declaration	
22	and Responses		
23	to Defendant's Interrogatories		
24	1, 4, and 5		
25	<u>Plaintiffs' Material</u>		
26	PDF Pages 4:6, 4:11, 5:10-13,		
27	5:15-16, 6:10-12, 6:15, 7:5-8,		
28	7:11		
	Broome Declaration Ex. 21	Olson Declaration ¶ 6;	
	Plaintiff William Byatt's	Plaintiffs to provide	
	Verified Amended Objections	declaration	
	and Responses		
	to Defendant's Interrogatories 1,		
	4, and 5		
	<u>Plaintiffs' Material</u>		

1	PDF Pages 4:6, 5:10-13, 5:15-16, 6:10-11, 6:14, 7:3-5, 7:8		
2	Broome Declaration Ex. 22	Olson Declaration ¶ 6; Plaintiffs to provide declaration	
3	Plaintiff Christopher Castillo's Verified Amended Objections and Responses to Defendant's Interrogatories 1, 4, and 5		
4	<u>Plaintiffs' Material</u>		
5	PDF Pages 4:6, 5:10-18, 6:12-18, 7:7-14		
6	Broome Declaration Ex. 23	Olson Declaration ¶ 6; Plaintiffs to provide declaration	
7	Plaintiff Jeremy Davis' Verified Amended Objections and Responses to Defendant's Interrogatories 1, 4, and 5		
8	<u>Plaintiffs' Material</u>		
9	PDF Pages 4:7, 5:10-13, 5:15- 17, 6:15, 7:10		
10	Broome Declaration Ex. 28	Olson Declaration ¶ 6; Plaintiffs to provide declaration	
11	Plaintiff Monique Trujillo's Objections and Responses to Defendant's First and Second Sets of Interrogatories (Nos. 3 & 10)		
12	<u>Plaintiffs' Material</u>		
13	PDF Pages 3:12, 4:13, 4:16-17, 4:20, 6:12-17, 7:11-13, 7:15		
14	Broome Declaration Ex. 30	Olson Declaration ¶ 6; Plaintiffs to provide declaration	
15	William Byatt's Objections and Responses to Defendant's Fourth Set of Interrogatories (Nos. 12-15)		
16	<u>Plaintiffs' Material</u>		
17	PDF Page 4:16-17, 4: 19-20		
18	Broome Declaration Ex. 39	Olson Declaration ¶ 6; Plaintiffs to provide	

1	Plaintiffs' Objections and Responses to Defendant's Sixth Set of Interrogatories (No. 17)	declaration	
2			
3	<u>Plaintiffs' Material</u>		
4			
5	7:11-13, 7:16-17, 7:20, 8:2-3, 8:6-7, 12:24-13:1		
6	Broome Declaration Ex. 41	Olson Declaration ¶¶ 3-5	
7	Defendant Google LLC's Objections and Responses to Plaintiffs' 7th Set of Interrogatories (Nos. 21-29)		
8			
9	Pages 4:7, 4:26, 6:17, 6:25-26, 7:13-14, 7:20, 7:27, 8:3-5, 8:13-14, 8:19		
10			
11	Broome Declaration Ex. 45	Olson Declaration ¶¶ 3-5	
12			
13	June 16, 2021 Glenn Berntson Deposition Transcript		
14	Pages 281:11, 372:11, 372:15		
15	Broome Declaration Ex. 56	Olson Declaration ¶¶ 3-5	
16			
17	February 18, 2022 Rory McClelland Deposition Transcript		
18	Page 277:5		
19	Broome Declaration Ex. 57	Olson Declaration ¶¶ 3-5	
20			
21	March 10, 2022 Stephen Chung 30(b)(6) Deposition Transcript		
22	Pages 25:7, 25:14, 25:23-24, 26:3, 26:5-9, 27:10-11		
23	Broome Declaration Ex. 65	Olson Declaration ¶¶ 3-5	
24			
25	Brown - Google Subscriber Information (GOOG-BRWN-00029466)		
26	Seal Entirely		
27	Broome Declaration Ex. 66	Olson Declaration ¶¶ 3-5	
28	Byatt - Google Subscriber		

1	Information (GOOG-BRWN-00030964)		
2	Seal Entirely		
3	Broome Declaration Ex. 67	Olson Declaration ¶¶ 3-5	
4	Castillo - Google Subscriber		
5	Information (GOOG-BRWN-00030104)		
6	Seal Entirely		
7	Broome Declaration Ex. 68	Olson Declaration ¶¶ 3-5	
8	Davis - Google Subscriber		
9	Information (GOOG-BRWN-00229529)		
10	Seal Entirely		
11	Broome Declaration Ex. 69	Olson Declaration ¶¶ 3-5	
12	Trujillo - Google Subscriber		
13	Information (GOOG-BRWN-00229514)		
14	Seal Entirely		
15	Broome Declaration Ex. 70	Olson Declaration ¶¶ 3-5	
16	Log Data Usage Rules (GOOG-BRWN-00029004)		
17	Seal Entirely		
18	Broome Declaration Ex. 71	Olson Declaration ¶¶ 3-5	
19	Device/App/Browser		
20	Fingerprinting and Immutable		
21	Identifiers Policy (GOOG-BRWN-00029326)		
22	Seal Entirely		
23	Broome Declaration Ex. 75	Olson Declaration ¶¶ 3-5	
24	April 15, 2022 Expert Report of		
25	Bruce Schneier		
26	Pages 25, 57-59, 73-75, 80, 83,		
27	87, 89-91, 93, 96-97		
28	Broome Declaration Ex. 77	Olson Declaration ¶¶ 3-6; Plaintiffs to provide	

1	April 15, 2022 Expert Report of Jonathan E. Hochman	declaration	
2			
3	<u>Plaintiffs' Material</u>		
4	Paragraphs 88-90, 115, 174-78, 224-25, 234, 236, 243, 246-47,		
5			
6	Appendix B - paragraphs 11-13, 18-23, pages 17-36		
7			
8	Appendix G - paragraphs 7-8, 24, 26		
9			
10	Appendix H - TOC and paragraphs 1-41		
11	<u>Google Material</u>		
12	Pages 9, 36, 44-46, 51-56, 59, 61, 63-71, 73-76, 82, 86-91, 93-		
13	96, 98-108, 110-112, 115-126, 128-132, 134, 136-137, 139,		
14	142, 145, 150, 152-154		
15	Appendix A - Pages 3-4, 15, 19		
16			
17	Appendix D - Pages 1-5		
18	Appendix E - Seal entirely		
19	Appendix F - Pages 2-10		
20	Appendix G - Pages 1-6, 8-13		
21	Appendix H - Pages 1-30		
22	Appendix I - Seal entirely		
23	Exhibit C - Seal entirely		
24	Exhibit E - Seal entirely		
25			
26	Broome Declaration Ex. 79	Olson Declaration ¶¶ 3-5	
27	May 20, 2022 Expert Report of Mark Keegan: Rebuttal of		
28	Expert Report of Professor On		

1	Amir		
2	Pages 59, 61		
3	Exhibit 8 - Pages:		
4	Keegan_Exhibits_81,		
5	Keegan_Exhibits_83-87		
6	Broome Declaration Ex. 80	Olson Declaration ¶¶ 3-5	
7	June 7, 2022 Expert Rebuttal		
8	Report of Georgios Zervas, PhD		
9	Pages 9, 53		
10	Broome Declaration Ex. 81	Olson Declaration ¶¶ 3-5	
11	June 7, 2022 Expert Report of		
12	Professor Paul Schwartz		
13	Pages 35-37, 39-41		
14	Broome Declaration Ex. 82	Olson Declaration ¶¶ 3-5	
15	June 7, 2022 Expert Report of		
16	Konstantinos Psounis, PhD		
17	Pages 3-4, 22-24, 31-32, 38-43,		
18	50-53, 58-59, 65-66, 73, 78, 87-		
19	89, 94-95, 105, 107-108, 110-		
20	112, 114, 117, 175-184, 187-		
21	190		
22	Broome Declaration Ex. 83	Olson Declaration ¶¶ 3-5	
23	August 4, 2022 Declaration of		
24	Glenn Berntson regarding		
25	Google Ad Manager and		
26	Google Adsense		
27	Pages 19:21-23, 20:20-24, 21:1-		
28	7		
	Broome Declaration Ex. 85	Olson Declaration ¶¶ 3-6;	
	August 5, 2022 Declaration of	Plaintiffs to provide	
	Jonathan McPhie Regarding	declaration	
	Google's Disclosures		
	<u>Plaintiffs' Material</u>		
	Pages 22:21, 22:23, 22:25, 23:2,		
	23:4, 23:6		

1	<u>Google Material</u>		
2	Pages 16:15, 16:18, 16:25,		
3	23:10, 23:14, 25:8, 26:11-12,		
4	29:3, 29:5-14, 32:5, 32:22,		
	33:10		
5	Broome Declaration Ex. 87	Olson Declaration ¶¶ 3-5	
6	Exhibit 15 to the August 5,		
7	2022 Declaration of Jonathan		
8	McPhie Regarding Google's		
	Disclosures (GOOG-CABR-		
	05435660)		
9	Seal Entirely		
10	Broome Declaration Ex. 88	Olson Declaration ¶¶ 3-5	
11	Exhibit 17 to the August 5,		
12	2022 Declaration of Jonathan		
13	McPhie Regarding Google's		
	Disclosures		
14	Seal Entirely		
15	Broome Declaration Ex. 142	Olson Declaration ¶¶ 3-5	
16	4/29/21 Monsees Depo Transcript		
	Excerpt		
17	Page 86:14-15, 20-22		

18 **SO ORDERED.**

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20 DATED: _____

21 _____
 22 HON. YVONNE GONZALEZ ROGERS
 23 United States District Judge
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